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11 *Attorneys for Defendant, Sentinel Insurance Company, Ltd. and The Hartford Financial Services*  
12 *Group, Inc.*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 GILBERT ARCHULETA,  
16  
17 Plaintiff,

18 vs.

19 THE HARTFORD FINANCIAL SERVICES  
20 GROUP, INC.; SENTINEL INSURANCE,  
21 LLC; SENTINEL INSURANCE COMPANY,  
22 LTD., 1 SOURCE INSURANCE GROUP;  
23 SILVER STATE HYDRAULIC SERVICES,  
24 INC.; and DOES I – V; ROE  
25 CORPORATIONS I – V; ROE EMPLOYEES  
26 I – V; ROE WHOLESALE I – V; and ROE  
27 RETAILER I - V, inclusive,

28 Defendants.

Case No.: 2:21-cv-01310

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO PLAINTIFF’S MOTION FOR  
REMAND [ECF No. 13]**

**[First Request]**

Plaintiff, Gilbert Archuleta. (“Plaintiff”) and Defendants Sentinel Insurance Company, Ltd. (“Sentinel”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On March 23, 2021, Plaintiff filed its Complaint in Eighth Judicial District Court, Case No. A-21-831643-C [ECF No. 1-2];
2. On July 9, 2021, Sentinel Petition for Removal to this Court [ECF No. 1];
3. On August 2, 2021, Plaintiff filed a Motion for Remand [ECF No. 13];
4. Defendants’ deadline to respond to Plaintiff’s Motions for Remand is currently August 16, 2021;

- 1 5. Sentinel's counsel is requesting an extension until August 30, 2021, to file its response  
2 to the pending Motions for Remand;  
3 6. This extension is requested because Sentinel requires additional time to review and  
4 response to the motion to remand. Sentinel's lead counsel was on a family vacation  
5 when the Motion for Remand was filed, and the associate assigned to the file is  
6 currently on maternity leave.  
7 7. Counsel for Plaintiff does not oppose the requested extension;  
8 8. This is the first request for an extension which is made in good faith and not for  
9 purposes of delay.

10 **IT IS SO STIPULATED.**

11 DATED this 9<sup>th</sup> day of August, 2021.

DATED this 9<sup>th</sup> day of August, 2021.

12 WRIGHT, FINLAY & ZAK, LLP

CHRISTENSEN LAW OFFICES, LLC

13 /s/ Darren T. Brenner

/s/ Dawn A. Hooker

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*Attorney for Plaintiff, Gilbert Archuleta*

19 **IT IS SO ORDERED.**

20 Dated this 10th day of August, 2021.

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22 \_\_\_\_\_  
23 UNITED STATES DISTRICT COURT JUDGE  
24  
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